

# **EXHIBIT D**

## Anthony Irpino

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**From:** Peter Mougey <pmougey@levinlaw.com>  
**Sent:** Saturday, May 30, 2020 9:52 AM  
**To:** 2804 Discovery, MDL; MDL 2804  
**Subject:** RE: EXTERNAL-Re: Agenda items 252, 232, and 253

I don't mean to be Debbie Downer on a Saturday Morning, but before congrats are in order we have only made a very small step forward. The parties have agreed to weekly calls, a renewed request for WAG to yet again review withheld documents based on previous orders etc. Please stay tuned for the year-old WAG min-series re its 16k docs withheld on its PL and whether we there is change in pace and scope.

Peter

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**From:** 2804 Discovery, MDL <mdl2804discovery@motleyrice.com>  
**Sent:** Friday, May 29, 2020 1:30 PM  
**To:** MDL 2804 <MDL2804@motleyrice.com>  
**Subject:** FW: EXTERNAL-Re: Agenda items 252, 232, and 253

**CAUTION:** This email  
message is **EXTERNAL**.

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**From:** David R. Cohen ([David@SpecialMaster.Law](mailto:David@SpecialMaster.Law)) <[david@specialmaster.law](mailto:david@specialmaster.law)>  
**Sent:** Friday, May 29, 2020 6:22:48 PM  
**To:** Sharon Desh <[Sharon.desh@bartlitbeck.com](mailto:Sharon.desh@bartlitbeck.com)>  
**Cc:** Pearl Robertson <[probertson@irpinolaw.com](mailto:probertson@irpinolaw.com)>; 2804 Discovery, MDL <[mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com)>; EXT Track1BDefendants <[EXT\\_Track1BDefendants@jonesday.com](mailto:EXT_Track1BDefendants@jonesday.com)>  
**Subject:** EXTERNAL-Re: Agenda items 252, 232, and 253

Congratulations and thanks, have a nice weekend.  
-d

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This email sent from:  
David R. Cohen Co. LPA  
24400 Chagrin Blvd., Suite 300  
Cleveland, OH 44122  
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**From:** Sharon Desh <[Sharon.desh@bartlitbeck.com](mailto:Sharon.desh@bartlitbeck.com)>  
**Sent:** Friday, May 29, 2020 2:14 PM  
**To:** David R. Cohen ([David@SpecialMaster.Law](mailto:David@SpecialMaster.Law)) <[david@specialmaster.law](mailto:david@specialmaster.law)>

**Cc:** Pearl Robertson <[probertson@irpinolaw.com](mailto:probertson@irpinolaw.com)>; 2804 Discovery, MDL <[mdl2804discovery@motleyrice.com](mailto:mdl2804discovery@motleyrice.com)>; EXT Track1BDefendants <[EXT\\_Track1BDefendants@jonesday.com](mailto:EXT_Track1BDefendants@jonesday.com)>

**Subject:** Agenda items 252, 232, and 253

Special Master Cohen,

By means of an update, the parties have resolved agenda items 252, 232, and 253 regarding outstanding privilege challenges. Each party reserves the right to raise good faith requests to the other regarding redactions once the downgrades are produced.

Thank you and have a nice weekend,

Sharon

**BartlitBeck** LLP

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